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#### BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268–0001

COMPETITIVE PRODUCT PRICES
INBOUND COMPETITIVE MULTI-SERVICE AGREEMENTS WITH
FOREIGN POSTAL OPERATORS
INTERCONNECT REMUNERATION AGREEMENT —
UNITED STATES POSTAL SERVICE AND
SPECIFIED POSTAL OPERATORS II (MC2010-34)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2022-34

# RESPONSE OF THE UNITED STATES POSTAL SERVICE TO QUESTION 1 OF CHAIRMAN'S INFORMATION REQUEST NO. 3

(September 26, 2022)

The United States Postal Service (Postal Service) hereby provides its responses to question 1 of Chairman's Information Request No. 3, issued on September 19, 2022. The question are stated verbatim and followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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### RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 3

- Please refer to the following attachments (Modifications) contained in the nonpublic folder "Mod\_FunctEquiv Inb Comp MSA wFPO\_NP" included with the Notice:
  - Att 1 NONPUBLIC CP2022-34 Revised 09-14-22.pdf at 25
  - Att 2 NONPUBLIC CP2022-34 Revised 09-14-22.pdf at 25
  - Att3 NONPUBLIC IRA-USPS II Agreement FPO1.pdf at 25
  - Att3 NONPUBLIC IRA-USPS II Agreement FPO2.pdf at 25
  - Att3 NONPUBLIC IRA-USPS II Agreement FPO3.pdf at 25
  - Att3 NONPUBLIC IRA-USPS II Agreement FPO4.pdf at 25
  - Att3 NONPUBLIC IRA-USPS II Agreement FPO5.pdf at 25
  - Att3 NONPUBLIC IRA-USPS II Agreement FPO6.pdf at 25
  - Att3 NONPUBLIC IRA-USPS II Agreement FPO7.pdf at 25
  - Att3 NONPUBLIC IRA-USPS II Agreement FPO8.pdf at 25
  - Att3 NONPUBLIC IRA-USPS II Agreement FPO9.pdf at 25
  - Att3 NONPUBLIC IRA-USPS II Agreement FPO10.pdf at 25

Please also refer to Order No. 6210<sup>1</sup> and the non-public folder "Mods\_Rates\_InbCompMulti-ServIRA-USPS II Agmt\_NP," June 3, 2022, Excel files "NONPUBLIC - IRAG\_IB\_Standard Packet\_WP (CP2022-34).xlsx" (Standard Packets Excel file), tab "02\_Inputs," cells C11:C14 and "NONPUBLIC - IRAG\_IB\_Standard\_Premium Parcel\_WP (CP2022-34).xlsx" (Standard Premium Parcel Excel file), tab "02\_Inputs," cells C11:C14.

- a. Please confirm that the Zone A-D per item rates for Standard Packets to the United States included in the Modifications differ from the corresponding rates approved by the Commission in Order No. 6210. If confirmed, please explain why the approved Zone A-D per item rates differ from the corresponding rates in the Modifications and file updated Modifications as necessary. If not confirmed, please explain.
- b. Please confirm that the Zone A-D per item rates for Premium Parcels to the United States included in the Modifications differ from the corresponding rates approved by the Commission in Order No. 6210. If confirmed, please explain why the approved Zone A-D per item rates differ from the corresponding rates in the Modifications and file updated Modifications as necessary. If not confirmed, please explain.

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<sup>&</sup>lt;sup>1</sup> Order Approving Modifications to Rates Under the Inbound Competitive Multi-Service IRA-USPS II Agreement, June 28, 2022 (Order No. 6210).

## RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 3

#### **RESPONSE:**

Please see Non-public Response, filed under seal. The Postal Service maintains that the information filed under seal should remain confidential and incorporates by reference its Application for Non-Public Treatment filed with its initial Notice in this docket. <sup>2</sup> The Postal Service requests that the Commission continue to grant its Application for Non-Public Treatment of the materials filed under seal in this matter.

<sup>&</sup>lt;sup>2</sup> Notice of United States Postal Service of Filing Functionally Equivalent Inbound Competitive Multi-Service Agreement with Foreign Postal Operators, Docket No. CP2022-34, December 8, 2021, at Attachment 1 (Application of United Postal Service for Non-Public Treatment of Materials).